

August 22, 2025

**VIA ECF**

Hon. Ona T. Wang  
U.S. District Judge for the Southern District of New York  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl Street  
New York, NY 10007

Re: Joint Letter re Status of *In Camera* Review, *In re OpenAI, Inc. Copyright Infringement Litigation*, No. 25-md-03143; This Document Relates To: *Baldacci et al. v. OpenAI, Inc. et al.*, No. 25-md-03143

Dear Judge Wang:

Pursuant to this Court's August 15, 2025 Order (ECF 495), OpenAI and Class Plaintiffs timely and jointly submit this letter. The Court directed the parties "to meet and confer and file a joint letter by August 22, 2025, indicating whether [the *in camera* review] dispute has been resolved." *Id.* "If the parties cannot resolve this dispute," the Court directed the parties "to include in their August 22 letter a proposed briefing schedule for *in camera* review of the remaining disputed documents." *Id.* The Court noted that if it "conducts *in camera* review, it will assess costs under Rule 37(a)(5)." *Id.*

The parties met and conferred on August 19, 2025. On August 20, OpenAI partially withdrew redactions to three documents. Class Plaintiffs no longer challenge those documents. Class Plaintiffs request that the Court review *in camera* the 20 remaining challenged documents for the reasons expressed in their July 30, 2025 letter (ECF 388) and in their forthcoming submission. OpenAI maintains that the withheld or redacted material in those documents is privileged as stated in its August 4, 2025 letter and supporting documents in response (ECF 424 *et seq.*), as well as in its forthcoming submission. The parties agreed to the below simultaneous briefing schedule. The parties further agreed to limit their letter briefs to 1,500 words each, plus exhibits.

Description	Deadline
Class Plaintiffs' deadline to file brief	<del>September 3, 2025</del>
OpenAI's deadline to file brief	

[SIGNATURE PAGE FOLLOWS]

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Sincerely,<sup>1</sup>

MORRISON & FOERSTER LLP

SUSMAN GODFREY LLP

*/s/ Joseph C. Gratz*

*/s/ Jordan Connors*

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Joseph C. Gratz  
(*pro hac vice*)

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Jordan Connors  
(*pro hac vice*)

*Counsel for OpenAI*

*Counsel for Class Plaintiffs*

The parties' briefs are due by **August 29, 2025**, and are not to exceed 1,500 words, not including exhibits.

**SO ORDERED.**



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Ona T. Wang  
U.S.M.J. 8/25/2025

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<sup>1</sup> All parties whose electronic signatures are included herein have consented to the filing of this document.